

DAVID SETH WORMAN, et al.,

Plaintiffs,

v.

MAURA HEALEY, et al.,

Defendants.

as he does in paragraphs 4–6, 8–32, 36, 44, 51 and 53–59 in his report and paragraphs 3, 5–16, 19, 27, 32–35 and 37–39 in his affidavit. And James Yurgealitis is not qualified to provide testimony regarding self-defense and hunting, firearms history, Massachusetts firearms laws, and statutory and regulatory interpretation, as he does in paragraphs 23–59, 70–71, 76–80 and 82–87 in his report and affidavit. In addition, Robert Spitzer and James Yurgealitis impermissibly offer legal conclusions in paragraphs 8–20 (Spitzer) and 71 (Yurgealitis) of their respective reports.

In support of this Motion, Plaintiffs submit an accompanying Memorandum of Law.

Dated: January 5, 2018

Respectfully submitted,

/s/ James M. Campbell

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of January, 2018, the foregoing was served on Defendants' counsel via CM/ECF system that will forward copies to Counsel of Record.

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I certify that, on January 5th, 2018, I conferred in good faith with Gary Klein, counsel for the Defendants, and Defendants oppose the relief requested in this motion.

/s/ John Parker Sweeney

John Parker Sweeney